

Before the
Federal Communications Commission
Washington, DC 20554

RECEIVED

OCT 16 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Application by Verizon New England,)
Inc. for Authorization Under Section 271)
of the Communications Act to Provide)
In-Region, InterLATA Service in the State)
of Massachusetts)

CC Docket No. 00-176

Comments of

National Black Chamber of Commerce
National Small Business United
United States Hispanic Chamber of Commerce

October 16, 2000

No. of Copies rec'd
List A B C D E

2

Table of Contents

Section	Page
I. Introduction	3
II. Statement of Interests	4
III. Comments	5
IV. Conclusion	7

I. INTRODUCTION

The undersigned organizations welcome the opportunity to submit the following comments in response to the Commission's Public Notice issued on September 22, 2000 regarding the application filed by Verizon Communications to provide in-region, interLATA service in the state of Massachusetts. The Commenters represent small business owners and entrepreneurs who have come together on this filing with the shared view that increased competition in the telecommunications industry market has a positive effect on pricing, innovation and economic expansion. Competition in the marketplace is beneficial for consumers, including small business owners and entrepreneurs.

In addition, we share the view that the Commission should enact public policies that promote the spirit and intent of the Telecommunications Act of 1996 which was enacted "to promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies."¹ The application by Verizon to provide long distance telephone service in the state of Massachusetts presents the Commission with an opportunity to move forward in pursuit of these worthwhile goals. The Commenters urge the Commission to approve the application so consumers, including small business owners, can reap the benefits of increased competition in the telecommunications marketplace.

¹ Public Law 104-1-4, Telecommunications Act of 1996, (February 8, 1996).

II. STATEMENT OF INTERESTS

National Black Chamber of Commerce (NBCC) is a nonprofit, nonpartisan, nonsectarian organization dedicated to the economic empowerment of African-American communities. The NBCC has 188 affiliated agencies as members. Throughout the 1990s, African-American businesses in the United States posted sales of more than \$32 billion annually. In general, African-Americans represent an annual spending base of over \$500 billion. NBCC has harnessed much of the power of these dollars and provides unique opportunities for corporations and African-American businesses to partner in creating greater opportunity for all people.

National Small Business United (NSBU) has been an advocate for small businesses since 1937. With 65,000+ U.S. members through its chapters and affiliate organizations, NSBU not only keeps small business owners in touch with legislative and regulatory issues that affect them, but this non-partisan advocacy group seeks to engage the small business community to take action. NSBU's membership is as diverse as the small business field. They are carpenters, consultants, manufacturers, retailers, grocers, designers - the small businesses that make up the backbone of America.

United States Hispanic Chamber of Commerce (USHCC) is a national organization that represents the interests of the Hispanic business community in the United States before the public and private sectors. Since its inception in 1979, the USHCC has worked through the network of nearly 200 Hispanic Chambers of Commerce and Hispanic business organizations to bring the issues and concerns of the nation's nearly 1.3 million Hispanic-owned businesses to the forefront of the national economic agenda. Currently, these businesses generate over \$200 billion in annual gross receipts.

Throughout the years, the Chamber has enjoyed outstanding working relationships with international Heads of State.

III. COMMENTS

The Commenters take note that since enactment of the Telecommunications Act of 1996, Verizon was the first Regional Bell Operating Company (RBOC) to secure approval by the Commission to provide long distance service in the state of New York. There is growing evidence that this action has produced benefits for consumers in New York and that competition has flourished.² Similar results are also materializing in the state of Texas which is the second location where a RBOC has received permission to enter the long distance market. We are confident that the success in New York and Texas will also become a reality in Massachusetts when Verizon enters the long distance market.

Verizon's application to provide long distance service in the state of Massachusetts will bring us another step closer to realizing the competitive environment envisioned by the authors of the Telecommunications Act of 1996. Verizon has already demonstrated the capacity to meet the 14-point checklist as illustrated in the New York application and a favorable review by KPMG Peat Marwick³ (the same independent firm that tested the company in New York) assures us that Verizon has prepared a solid 271 application for Massachusetts.

The Commenters have also taken note that competition appears to be thriving in Massachusetts with nearly 700,000 customers being served by competitive local exchange companies and with 14 million telephone numbers assigned and available for

² See Press Release "NYPSC Issues Telecom Report: Competition Intensifying" issued by the State of New York Public Service Commission (September 20, 2000).

competitors usage.⁴ With the Massachusetts Department of Telecommunications and Energy (DTE) conducting an intensive 16 month review of Verizon's systems and procedures, including public proceedings with competitive local exchange companies, the Commenters are confident that the company has worked earnestly to address and resolve concerns to a satisfaction. We also understand that the DTE has put in place a performance assurance plan that is similar to the one enacted in New York, which places \$142 million in annual bill credits at risk. This performance assurance plan will provide an incentive to ensure that the local market will remain open after Verizon receives permission to enter the long distance market.

Small business owners and entrepreneurs want choice, affordable rates, innovation and administrative efficiency so they can spend time expanding their business. If the application before the Commission is approved, small businesses owners and entrepreneurs in Massachusetts will have the option of purchasing all their telecommunications services from one provider and they will be in a stronger position to secure affordable rates for services and plans that meet their needs. By allowing Verizon to offer long distance service, consumers can take advantage of one-stop shopping and benefit from multiple service packages and new calling plans. One stop shopping also enhances the ability of small business owners and entrepreneurs to command higher levels of customer service and competitive pricing.

In addition, by opening up the long distance market to Verizon, the Commission will put added pressure on the existing long distance companies to compete for local telephone service and to offer innovative packages and pricing plans. All the way

³ See Application submitted by Verizon Communications, Inc. to Provide Long Distance Service in the State of Massachusetts, CC Docket 00-176, page 9.

⁴ See "Massachusetts Phone Competition at a Glance," www.verizon.com

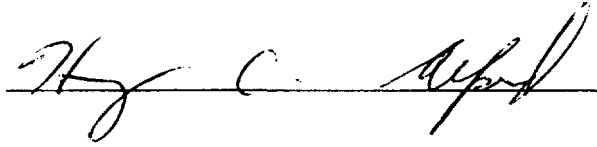
around, more competition means good things for consumers, including small business owners and entrepreneurs. For too long, only big businesses could take advantage of competition and small businesses struggled. Verizon is changing the telecommunications landscape and we applaud their effort to take all the necessary steps to satisfy the requirements of the 14-point checklist. Consequently, the Commenters support the aforementioned application and recommend that the Commission approve the application expeditiously.

IV. CONCLUSION

The Commenters look forward to the day when the Telecommunications Act of 1996 is fully realized and when small business owners and entrepreneurs can truly benefit from a robust competitive telecommunications market. We believe the Verizon application to provide long distance service in Massachusetts is an opportunity to move forward in pursuit of these goals. We also believe the application is with strong merit and in the public interest of both residential and business consumers in Massachusetts.

Finally, the Commenters are familiar with Verizon as a corporate citizen and would like to acknowledge the commitment the company has made to supplier diversity and economic empowerment. We look forward to increased opportunities for minority and small businesses as the company expands in the long distance marketplace. The Commenters will welcome Commission approval of Verizon's application to provide long distance service in Massachusetts.

Respectively submitted by,

A handwritten signature in black ink, appearing to read "H. C. Alford", is written over a horizontal line.

Harry C. Alford, President and CEO
National Black Chamber of Commerce
1350 Connecticut Avenue, NW, Suite 825
Washington, DC 20036

Todd McCracken, President
National Small Business United
1156 15th Street, NW, Suite 1100
Washington, DC 20005

George Herrera, President and CEO
United States Hispanic Chamber of Commerce
2175 K Street, NW
Washington, DC 20037